

TODD KIM  
Assistant Attorney General  
Environment and Natural Resources Division  
United States Department of Justice

ARWYN CARROLL (MA Bar 675926)  
LEILANI DOKTOR (HI Bar 11201)  
Natural Resources Section  
P.O. Box 7611  
Washington, D.C. 20044-7611  
Phone: (202) 305-0465  
Fax: (202) 305-0506  
arwyn.carroll@usdoj.gov  
leilani.doktor@usdoj.gov

*Attorneys for Federal Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BARTELL RANCH LLC, *et al.*,  
Plaintiffs,

v.

ESTER M. MCCULLOUGH, *et al.*,  
Defendants.

WESTERN WATERSHEDS  
PROJECT, *et al.*,  
Plaintiffs,

v.

UNITED STATES DEPARTMENT  
OF THE INTERIOR, *et al.*,  
Defendants.

Case No. 3:21-cv-80-MMD-CLB  
Related Case No. 3:21-cv-103-MMD-  
CLB  
(Consolidated)

**FEDERAL DEFENDANTS'  
UNOPPOSED MOTION FOR  
EXTENSION OF TIME**

**(FIRST MOTION)**

1 Federal Defendants respectfully request an extension of time to respond to two  
2 non-dispositive motions recently filed by Intervenor-Plaintiff Reno Sparks Indian  
3 Colony (RSIC) and Plaintiffs Bartell Ranch LLC and Edward Bartell (the Bartell  
4 Plaintiffs). Neither proposed extension would alter the timeline for resolution of  
5 dispositive motions in this case.

6 First, on April 4, 2022, RSIC filed a motion seeking sanctions under Fed. R.  
7 Civ. P. 37(b) and 28 U.S.C. § 1927. ECF No. 200. Under Local Rule 7-2(b), Federal  
8 Defendants' deadline for responding to that motion is Monday, April 18, 2022. To  
9 accommodate the press of other litigation matters, as well as the schedules of those  
10 within the Department of Justice who must review a response to such a motion,  
11 Federal Defendants request a short, 4-day extension of this deadline to Friday,  
12 April 22, 2022. Counsel for Federal Defendants have conferred with counsel for  
13 RSIC, who stated that RSIC does not oppose this extension.

14 Second, on April 5, 2022, all Plaintiffs and Intervenor-Plaintiffs filed their  
15 motions for summary judgment. ECF Nos. 202–205. In addition, the Bartell Plaintiffs  
16 filed a motion asking the Court to consider extra-record evidence in connection with  
17 their summary judgment motion. ECF No. 207. Under Local Rule 7-2(b), Federal  
18 Defendants' deadline for responding to that record-related motion is April 19, 2022.  
19 Federal Defendants request an extension of this deadline, such that their response is  
20 due on May 20—at the same time as their response to the Bartell Plaintiffs' motion  
21 for summary judgment—so that Federal Defendants may coordinate their responses  
22 to these two related motions. Counsel for Federal Defendants have conferred with  
23 counsel for the Bartell Plaintiffs, who stated that the Bartell Plaintiffs do not oppose  
24 this extension.

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1 In sum, Federal Defendants respectfully request the following extensions of  
2 deadlines for non-dispositive motions pending in this case:

- 3 • That their deadline for responding to ECF No. 200 be extended from  
4 April 18, 2022 to April 22, 2022; and
- 5 • That their deadline for responding to ECF No. 207 be extended from  
6 April 19, 2022 to May 20, 2022.

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8 Respectfully submitted this 8th day of April, 2022.

9  
10 TODD KIM  
11 Assistant Attorney General  
12 United States Department of Justice  
Environment and Natural Resources Div.

13 /s/ Arwyn Carroll  
14 ARWYN CARROLL (MA Bar 675926)  
15 LEILANI DOKTOR (HI Bar 11201)  
16 Trial Attorney  
17 Natural Resources Section  
18 P.O. Box 7611  
19 Washington, D.C. 20044-7611  
20 Phone: 202-305-0465  
21 Fax: 202-305-0506  
22 arwyn.carroll@usdoj.gov  
23 leilani.doktor@usdoj.gov

24 *Attorneys for Federal Defendants*  
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